



**Joseph M. Kuffler** | Counsel

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September 16, 2022

By Electronic Filing

Hon. Paul A. Engelmayer  
United States District Judge  
Southern District of New York

RE: *In Re: ONE Apus Container Ship Incident on November 30, 2020*  
Civil Action No. 22-md-3028 (PAE)

Dear Judge Engelmayer:

In accordance with Your Honor's June 30, 2022 Order, the undersigned submits this letter-motion for admission to represent Plaintiffs in the following two actions:

1. *MSIG Mingtai Ins. Co. v. M/V ONE Apus, et al.*  
Civil Action No. 1:22-cv-7368 (SDNY)  
Notice of Tag-Along filed with MDL on July 22, 2022  
Transferred from ND Cal. to SDNY on August 23, 2022
2. *Union Ins. Co., Ltd., et al. v. M/V ONE Apus, et al.*  
Civil Action No. 1:22-cv-3836 (SDNY)  
Notice of Tag-Along filed with SDNY on June 29, 2022

I am a member in good standing of the Bar in the Commonwealth of Pennsylvania and the State of New Jersey, and there are no pending disciplinary proceedings against me in any state or federal court. Certificates of good standing with the Bars of Pennsylvania and New Jersey are attached hereto as Exhibits A and B. respectively. I have also attached a Proposed Order for Your Honor's consideration. My contact information is:

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Please let me know if Your Honor requires any additional information.

Respectfully submitted,

WHITE AND WILLIAMS LLP

/s/ *Joseph M. Kuffler*


Joseph M. Kuffler

JMK:jmk  
Attachments

cc: All Counsel of Record (via ECF)

Granted. Counsel is admitted to represent  
Plaintiffs in the two above-named actions.

SO ORDERED.

  
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PAUL A. ENGELMAYER  
United States District Judge  
September 16, 2022